

EXHIBIT C

**U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION
Washington Field Office**

DELTON GOODRUM)
)
Complainant,)
) EEOC Charge No.: 570-2023-00841
v.)
)
CITY OF ALEXANDRIA)
(POLICE DEPARTMENT))
)
Respondent.)
)

AFFIDAVIT OF DON HAYES

DON HAYES being first duly sworn, hereby deposes and states:

1. I am over 18 and competent to testify to the matters contained in this affidavit.
2. I am the Chief of the Alexandria Police Department. I was appointed Chief on April 18, 2022, having been Acting Chief since June 2021. I have worked for the Department continuously since I joined as a Patrol Officer in 1981.
3. In 2021, Lieutenant Delton Goodrum was transferred to the Department's Human Resources and Training Division, even though he had requested a transfer to the Traffic and Safety Section. This transfer coincided with the transfers of other lieutenants and sergeants of the Alexandria Police Department. Lieutenant Goodrum was transferred to the Human Resources and Training Division for the betterment of the Department and for the development of his administrative skills.
4. In March 2022, Lieutenant Delton Goodrum was transferred from the Department's Human Resources and Training Division to the Patrol Operations Bureau, Patrol Division 2, Traffic and Safety Section. This transfer was necessitated due to an operational need to spearhead a robust recruiting program to address our increased attrition rate of sworn personnel. Lieutenant Marcus Downey was transferred into the position because of his attention to detail and organizational skills. Under his command we have been able to surpass our attrition rate with qualified candidates. The transfer was made for the betterment of the department.

5. Lieutenant Goodrum was transferred to the Traffic and Safety Section because of his traffic experience and his ability to motivate the personnel assigned to the Traffic Section.

6. In June 2022, Lieutenant Courtney Ballantine was promoted to the rank of Captain and assigned to the Community Relations Division. He was given the position of Acting Captain under former Chief of Police Michael Brown. Captain Ballantine has performed his duties as the commander of the division and continues to do a great job.

7. In October 2022, Lieutenant Downey was elevated to the position of Acting Captain to assist with the administrative duties within the Division because of the separation of employment by our Human Resource Director Sharntel Sutton. This was meant to be a temporary role and was executed because he was familiar with the operations of the HR Division, and it would not necessitate transferring another commander into the Division. With the vacancy of the Human Resource Director position, we needed a commander to fulfill that role of making command decisions. This role only lasted a few weeks.

8. In December 2022, Lieutenant Jerry Newcomb was promoted to the rank of Captain. In January 2023, he was transferred to Patrol Sector 3 of the Field Operations Bureau. This was part of the reorganization and having the captains in patrol return to sector policing for accountability. Captain Newcomb brings a fresh approach to Community Policing. Having recently been recognized by the members of the Concerns Of Police Survivors (COPS) for his contributions for organizing Police Week. Captain Newcomb is community oriented. He also brings with him the Criminal Investigations experience that is needed in the patrol division of the Field Operations Bureau. Due to our staffing situation patrol officers will be following up on more criminal cases and Captain Newcomb's experience allows him to train officers to do this work. He will also assist in our "One Police Department" philosophy. The goal is to get the detectives and the officers to work more together, and Captain Newcomb will be able to make this happen.

9. At no time have I ever transferred Lieutenant Goodrum, failed to promote him, or taken any other action out of discriminatory or retaliatory animus.

I, DON HAYES, HEREBY SWEAR OR AFFIRM THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND INFORMATION.



Police Chief Don Hayes

COMMONWEALTH OF VIRGINIA
CITY OF ALEXANDRIA:

Subscribed and sworn before me, a Notary Public for the city and state identified above, by _____ on this _____ day of _____, 2023.

My commission expires: _____